

## REMARKS

In the final Office Action in the parent application, the claims were rejected on the basis of U.S. Patent No. 5,195,465 to Webb et al., U.S. Patent No. 4,708,294 to Endom and a prior art advertisement of an Insta Pro Model 2500 Extruder. It is respectfully submitted that the claims presented in this amendment are allowable over any combination that can be made of these references or any other known prior art.

Amended claim 14 calls for the step of removing substantially all of the soiled litter from the poultry house, placing the processed litter in the poultry house at a time when the processed litter is still warmer than the poultry house so that the litter contributes to heating the poultry house, and introducing the next group of birds into the poultry house no later than two days after the processed litter has been placed in it. Nothing similar to this is found in the prior art.

First of all, the Webb patent and the remaining references of record do not teach removing substantially all of the soiled litter from the poultry house. On the contrary, the prior art is silent as to this, and, as pointed out in the present application on page 1, the conventional practice involves removing only the clumped or caked portion of the soiled litter and does not involve removing substantially all of the soiled litter. In view of this conventional practice and the fact that the prior art is silent as to removing substantially all of the soiled litter, the combined teaching of the prior art is to remove only part of the soiled litter rather than substantially all of it. Consequently, this feature alone is submitted to make amended claim 14 allowable.

Step (F) has been amended to call for placing the processed litter at a time when it is still warmer than the poultry house so that the processed litter assists in warming of the poultry house. Nothing in the prior art suggests using the processed litter for heating of a poultry house, and there is absolutely no suggestion that processed litter at an elevated temperature can be placed in the poultry house in order to assist in heating it. Accordingly, this feature alone is submitted to place amended 14 in allowable form.

Step (G) of amended claim 14 calls for a second plurality of birds to be introduced into the poultry house no later than two days after the processed litter has been placed therein. As set forth in the present application in the paragraph that begins at the bottom of page 11 and continues on page 12, conventional practice requires one to two weeks "downtime" of a poultry house between litter changing. Due to the unique features of the process of the present invention, this significant downtime can be reduced markedly to no more than two days, as recited in amended claim 14. There is clearly nothing in the prior art that suggests that a new group of birds can be introduced into a poultry house having processed litter in a time as short as two days after the litter has been processed and placed in the poultry house. On the contrary, the conventional practice is that a new group of birds cannot be introduced for a time period less than about one-two weeks. The reduced downtime is a clear advantage that is achieved by the present invention, and it constitutes a significant practical improvement in the art.

For all of the foregoing reasons, amended claim 14 is submitted to be clearly allowable over the prior art of record and all other known prior art.

Claim 15 has been canceled and claim 16 has been amended to change the claim from which it depends. Amended claim 16 and dependent claims 17-20 remain in the case and

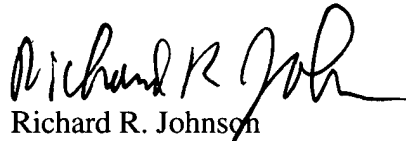
are submitted to be allowable by reason of their dependence on an allowable parent claim, as well as on their own merits.

Claim 45 is an added independent claim that is allowable for substantially the same reasons as amended claim 14. Again, it calls for removing substantially all of the soiled litter and for introducing a second group of birds into the poultry house no later than two days after the processed litter has been placed in it. For the reasons previously given, these features are not taught or suggested by the prior art and result in significant practical advantages that cannot be obtained by anything found in the prior art. Consequently, claim 45 is submitted to be allowable along with its dependent claims 46 and 47 which include features making them patentable on their own merits.

In view of the foregoing, it is respectfully submitted that all of the claims presented for the consideration of the Examiner are allowable. Consequently, this application is submitted to be in condition for allowance.

The Commissioner is hereby authorized to charge any additional fees that are required, or credit any overpayment to Deposit Account No. 19-2112.

Respectfully submitted,

  
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